

REMARKS

Claims 1-11 remain pending in this application, with Claims 1, 9 and 10 being independent. No claims have been amended herein.

Claims 1 and 3-11 were rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent Application Publication No. 2005/0041081 (Horii et al.). Claims 1 and 2 were rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent Application Publication No. 2003/0030692 (Uchida) in view of Horii et al.. These rejections are respectfully traversed.

Each of independent Claims 1, 9 and 10 recites, *inter alia*, a coagulation inhibitor that inhibits coagulation of colorant contained in ink discharged from a printhead by preventing contact among particles of the colorant due to an effect of steric hindrance. A coagulation inhibitor is important to overcome the phenomenon discussed at page 34, line 22 to page 35, line 15. Namely, when pigment is discharged from a printhead and introduced into an absorber, the pigment particles coagulate on the surface of the absorber. The present invention can utilize a coagulation inhibitor utilizing the effect of steric hindrance to avoid this phenomenon.

Applicants' specification, at pages 35-37, describes different types of coagulation inhibitors that can be used. The paragraph at page 36 beginning at line 9 describes a coagulation inhibitor formed of a material that can disperse colorant particles by the effect of steric hindrance, and lists two specific examples. In the paragraph at page 36 beginning at line 17, other types of coagulation inhibitors are described. One specific

type uses a chelating agent and three specific examples are listed. Applicants' claims, however, recite the first type of coagulation inhibitor, namely, one that prevents contact among particles of the colorant due to an effect of steric hindrance.

Horii et al. does not disclose or suggest such a coagulation inhibitor. Rather, Horii et al. describes another type coagulation inhibitor, namely, a chelating agent. While Horii et al. May list at least one example that is common to an example described in Applicants' specification, that example is a chelating agent, not a coagulation inhibitor that utilizes that effect of steric hindrance. Thus, Horii et al. fails to disclose or suggest important features of the present invention recited in the independent claims.

The Office Action suggests that Horii et al. "discloses the same chemical composition as applicants' own specification," and "does perform the same function." Further, the Office Action takes the position that it would have been obvious that Horii et al. "teaches the preventing contact among particles of the colorant due to an effect of steric hindrance." Applicants respectfully disagree and stress that chelating agents do not inhibit coagulation due to an effect of steric hindrance. As discussed above, any common compounds are in the category of chelating agents, not those that utilize an effect of steric hindrance. Chelating agents significantly differ from the other type of coagulation inhibitors. Applicants submit that the stability of the chelating agent is dependent on the pH level of the liquid, so chelating may not always be performed depending on the pH level of the liquid mixed with ink. Coagulation inhibitors that use the effect of steric hindrance are not dependent on pH level and thus provide coagulation inhibition stability.

Horii et al. fails to disclose or suggest important features of the present invention recited in the independent claims.

Uchida describes an ink jet recording apparatus that includes a platen absorber. Uchida, however, is not believed to remedy the deficiencies of Horii et al. noted above with respect to the independent claims.

Accordingly, Claims 1 and 9 are patentable over the citations of record. Reconsideration and withdrawal of the § 102 and § 103 rejections are respectfully requested.

For the foregoing reasons, Applicants respectfully submit that the present invention is patentably defined by independent Claims 1, 9 and 10. Dependent Claims 2-8 and 11 are also allowable, in their own right, for defining features of the present invention in addition to those recited in their respective independent claims. Individual consideration of the dependent claims is requested.

Applicants submit that the present application is in condition for allowance. Favorable reconsideration, withdrawal of the rejections set forth in the above-noted Office Action, and an early Notice of Allowability are requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Mark A. Williamson/

Mark A. Williamson
Attorney for Applicants
Registration No. 33,628

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
MAW:tr

FCHS_WS 3577953v1